

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Charles H Prem

Debtor(s)

Andrews Federal Credit Union

Movant

vs.

Charles H Prem

Respondent(s)

BK NO. 24-13445 AMC

Chapter 13

Hearing Date: 01/15/25

**OBJECTION OF ANDREWS FEDERAL CREDIT UNION
TO CONFIRMATION OF CHAPTER 13 PLAN**

Andrews Federal Credit Union (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On or before the Bar Date of December 4, 2024, Secured Creditor will file a secured proof of claim setting forth an estimated pre-petition arrears in the amount of \$78,183.65.
2. Debtor's Plan provides for payment in the amount of \$48,500.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$29,683.65 and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, Andrews Federal Credit Union, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: October 25, 2024

By: /s/ Denise Carlon
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